Augustus C. Epps, Jr., Esquire (VSB 13254) Michael D. Mueller, Esquire (VSB 38216) Jennifer M. McLemore, Esquire (VSB 47164) CHRISTIAN & BARTON, L.L.P. 909 East Main Street, Suite 1200 Richmond, Virginia 23219 Telephone: (804) 697-4100

Facsimile: (804) 697-4112

Local Counsel for Carousel Center Company, L.P., EklecCo NewCo, LLC, Sangertown Square, L.L.C., Mount Berry Square, LLC, Washington Commons Associates, Fingerlakes Crossing, LLC, Cameron Bayonne, L.L.C., Landover (Landover Crossing), LLC and Charlotte (Archdale) UY, LLC

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA (RICHMOND DIVISION)

In re:

CIRCUIT CITY STORES, INC., et al.

Case No. 08-35653-KRH Jointly Administered Chapter 11 Proceedings

Debtors.

MOTION FOR ADMISSION *PRO HAC VICE* PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2) OF KEVIN M. NEWMAN

Jennifer M. McLemore (the "Movant") hereby moves this Court, pursuant to Local Bankruptcy Rule 2090-1(E), for an order authorizing Kevin M. Newman ("Mr. Newman"), an attorney with the law firm of Menter, Rudin & Trivelpiece, P.C., to appear *pro hac vice* in the referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Case") to represent Carousel Center Company, L.P., EklecCo NewCo, LLC, Sangertown Square, L.L.C., Mount Berry Square, LLC, Washington Commons Associates, Fingerlakes Crossing, LLC, Cameron Bayonne, L.L.C., Landover (Landover Crossing), LLC and Charlotte (Archdale) UY, LLC (collectively the "Landlords"), and in support of this Motion, the Movant states as follows:

- Movant is a member in good standing of the bar of the Supreme Court of the Commonwealth of Virginia and admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.
- 2. Mr. Newman is a member in good standing of the bar of the State of New York and admitted to practice before the following courts:

Courts to Which		Date of
Fully Admitted	Location	Admission
State of New York	Fourth Judicial Department	1/15/1987
U.S. Bankruptcy Court	Northern District of New York	2/17/1987
U.S. Bankruptcy Court	Western District of New York	4/21/1987
U.S. Bankruptcy Court	Southern District of New York	8/1/1995
U.S. Bankruptcy Court	Eastern District of Michigan	4/9/1998

- 3. Movant requests that this Court authorize Mr. Newman to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of the Landlords.
- 4. Movant and her law firm shall serve as local counsel with Mr. Newman in the Bankruptcy Case (and related proceedings).
- 5. Notice of this Motion has been given to (a) the Office of the United States

 Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notice in the

 Bankruptcy Case as of the date hereof.
- 6. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.
- 7. No prior request for the relief sought herein has been made to this Court in these Bankruptcy Cases or to any other court.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Kevin M. Newman to appear *pro hac vice* in the Bankruptcy Case (and related proceedings) in substantially the same form as Exhibit A attached hereto and grant such other and further as to the Court seems just and proper.

Dated: January 16, 2009

/s/ Jennifer M. McLemore

JENNIFER M. McLEMORE (VSB 47164)

Christian & Barton, L.L.P.

909 East Main Street, Suite 1200

Richmond, Virginia 23219

Telephone: (804) 697-4100 Facsimile: (804) 697-4112

Local Counsel for Carousel Center Company, L.P., EklecCo NewCo, LLC, Sangertown Square, L.L.C., Mount Berry Square, LLC, Washington Commons Associates, Fingerlakes Crossing, LLC, Cameron Bayonne, L.L.C., Landover (Landover Crossing), LLC and Charlotte (Archdale) UY, LLC

CERTIFICATE OF SERVICE

I hereby certify that I will cause a copy of the *Motion to Admission Pro Hac Vice Pursuant to Local Bankruptcy Rule 2090-1(E)(2) of Kevin M. Newman* to be served by electronic means or by first class mail, postage prepaid, to the persons required to be served.

Dated: January 16, 2009

/s/ Jennifer M. McLemore
JENNIFER M. McLEMORE (VSB 47164)
Christian & Barton, L.L.P.
909 East Main Street, Suite 1200
Richmond, Virginia 23219
Telephone: (804) 697-4100

Facsimile: (804) 697-4112

Local Counsel for Carousel Center Company, L.P., EklecCo NewCo, LLC, Sangertown Square, L.L.C., Mount Berry Square, LLC, Washington Commons Associates, Fingerlakes Crossing, LLC, Cameron Bayonne, L.L.C., Landover (Landover Crossing), LLC and Charlotte (Archdale) UY, LLC

EXHIBIT A

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA (RICHMOND DIVISION)

In re:

CIRCUIT CITY STORES, INC., et al.

Case No. 08-35653-KRH Jointly Administered Chapter 11 Proceedings

Debtors.

ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE* PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2) OF KEVIN M. NEWMAN

The matter came before the Court upon Motion (the "Motion") filed by Jennifer M. McLemore, seeking admission *pro hac vice* for Kevin M. Newman, of the law firm of Menter, Rudin & Trivelpiece, P.C., in the above referenced bankruptcy cases (and related proceedings) (the "Bankruptcy Cases") pursuant to Local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Kevin M. Newman be authorized to practice *pro hac vice* before this Court in these Bankruptcy Cases (and related proceedings), it is hereby

ORDERED as follows:

- 1. The Motion be and hereby is granted;
- 2. Kevin M. Newman, of the law firm, Menter, Rudin & Trivelpiece, P.C., is hereby admitted to appear in these Bankruptcy Cases and any related proceedings *pro hac vice* pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of Carousel Center Company, L.P., EklecCo NewCo, LLC, Sangertown Square, L.L.C., Mount Berry Square, LLC, Washington Commons Associates, Fingerlakes Crossing, LLC, Cameron Bayonne, L.L.C., Landover (Landover Crossing), LLC and Charlotte (Archdale) UY, LLC.

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

JENNIFER M. McLEMORE (VSB 47164) Christian & Barton, L.L.P. 909 East Main Street, Suite 1200 Richmond, Virginia 23219

Telephone: (804) 697-4100 Facsimile: (804) 697-4112

Rule 9022-1 Certification

I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties.

/s/ Jennifer M. McLemore
JENNIFER M. McLEMORE (VSB 47164), Movant
Christian & Barton, L.L.P.
909 East Main Street, Suite 1200
Richmond, Virginia 23219
Telephone: (804) 697-4100

Facsimile: (804) 697-4112

Local Counsel for Carousel Center Company, L.P., EklecCo NewCo, LLC, Sangertown Square, L.L.C., Mount Berry Square, LLC, Washington Commons Associates, Fingerlakes Crossing, LLC, Cameron Bayonne, L.L.C., Landover (Landover Crossing), LLC and Charlotte (Archdale) UY, LLC

SERVICE LIST

Robert B. Van Arsdale, Esq. Assistant United States Trustee Office of the United States Trustee 701 East Broad Street, Suite 4304 Richmond, Virginia 23219

Dion W. Hayes, Esq. McGuire Woods LLP Attorneys for the Debtors One James Center 9801 East Cary Street Richmond, Virginia 23219

Greg M. Galardi, Esq. Skadden, Arps, Slate, Meagher & Flom Attorneys for the Debtors One Rodney Square P.O. Box 636 Wilmington, Delaware 19899-0636